

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LEADENHALL CAPITAL PARTNERS LLP,  
LEADENHALL LIFE INSURANCE  
LINKED INVESTMENTS FUND PLC,

Plaintiffs,

vs.

Civil Action No. 1:24-cv-03453-JGK

JOSH WANDER, STEVEN PASKO,  
KENNETH KING, 777 PARTNERS LLC,  
600 PARTNERS LLC, SPLCSS III LLC,  
SIGNAL SML 4 LLC, INSURETY AGENCY  
SERVICES LLC, DORCHESTER  
RECEIVABLES II LLC, SUTTONPARK  
CAPITAL LLC, SIGNAL MEDICAL  
RECEIVABLES LLC, INSURETY CAPITAL  
LLC, SUTTONPARK SERVICING LLC,  
ADVANTAGE CAPITAL HOLDINGS LLC,

Defendants.

**DECLARATION OF LEIGH M. NATHANSON**

I, Leigh M. Nathanson, declare under penalty of perjury that the following statements are true and correct:

1. I am an attorney licensed and admitted to practice in the state of New York and a partner at King & Spalding LLP, counsel for Plaintiffs Leadenhall Capital Partners LLP and Leadenhall Life Insurance Linked Investments Fund PLC (“Leadenhall”).

2. I submit this Declaration in support of Leadenhall’s Reply in support of its Motion for Contempt Against the Guarantors, A-CAP, and Kenneth King.<sup>1</sup>

---

<sup>1</sup> Capitalized terms have the same meaning as set forth in Leadenhall’s accompanying Memorandum of Law.

3. Attached hereto as Exhibit AA is a true and correct copy of a Notice of Disposition of Collateral, from ACM Delegate LLC to 600 Partners LLC, dated May 26, 2025.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 27, 2025

/s/ Leigh M. Nathanson  
Leigh M. Nathanson